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March 30, 2021

VIA ECF

Honorable Debra Freeman
United States District Magistrate Judge
United States District Court
500 Pearl Street
New York, New York 11201

Re: *Segarra v. Commissioner of Social Security,*
Civil Action No. 1:20-cv-05801-PGG-DCF

Dear Judge Freeman,

We write on behalf of plaintiff, Iris Segarra, and with the consent of the defendant, to request a 60-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on March 30, 2021. Plaintiff respectfully requests an extension of time up to and including May 29, 2021. This is plaintiff's first request for an extension of time.

The parties have exchanged written contentions expressing their respective positions regarding a possible remand. The parties were not able to reach an agreement.

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Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to file her motion for judgment on the pleadings on or before **May 29, 2021**;
- b. Defendant to file its response/cross-motion on or before **July 28, 2021**; and
- c. Plaintiff to file her reply (if any) on or before **August 18, 2021**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
Daniel A. Osborn

cc: Nahid Sorooshyari, Esq. (by ECF)

The proposed briefing schedule is adopted.
No further extensions.

SO ORDERED


DEBRA FREEMAN
United States Magistrate Judge

Dated: 4/3/2021